

# **EXHIBIT G**

1 A I'm white.

2 Q What are your current political affiliations?

3 MR. GOLD: Objection.

4 THE WITNESS: I'm a registered democrat.

5 MR. KLEINMAN: And when you say a registered  
6 democrat, does that mean you're  
7 registered to vote?

8 THE WITNESS: Yes.

9 BY MR. KLEINMAN:

10 Q How long have you been registered to vote for?

11 A Since I was 18 years old.

12 Q And have you been registered as a democrat since  
13 you've been registered to vote?

14 A Yes.

15 Q Did you vote in the 2020 presidential election?

16 A I did.

17 Q Did you vote in-person or by mail?

18 A In-person.

19 Q Is there a particular reason you decided to vote  
20 in-person?

21 A No.

22 Q Prior to the November 2020 presidential election,  
23 did you vote in-person in other federal, state  
24 and local elections?

25 A Yes.

1 MR. GOLD: Objection.

2 THE WITNESS: Yes.

3 MR. KLEINMAN: By the way, would it surprise you to  
4 learn that Tamika Taylor was white?

5 MR. GOLD: Objection.

6 THE WITNESS: No.

7 MR. KLEINMAN: What community of people are you  
8 alleging that the robocall was  
9 targeted toward?

10 THE WITNESS: The black community.

11 BY MR. KLEINMAN:

12 Q What specifically about the robocall leads you to  
13 that conclusion?

14 A Through my experience in working with the black  
15 community I understand that these are frequent  
16 tropes that are used to dissuade black people  
17 from participating civically in many different  
18 ways.

19 Q Once again, looking at Paragraph 51 of the  
20 transcript, is there anything in the transcript  
21 that tells people not to vote?

22 A It tells people not to register to vote.

23 Q Where does it say that?

24 A Don't be finessed into giving your private  
25 information to the man in regard to mail-in

1 voting.

2 Q So you take that to mean, your interpretation of  
3 that statement is that it's telling people not to  
4 register to vote?

5 A Yes.

6 Q Okay. Have you spoken to anyone in the black  
7 community about this robocall in particular?

8 MR. GOLD: Objection.

9 THE WITNESS: No.

10 MR. KLEINMAN: Why not?

11 THE WITNESS: Not my job.

12 MR. KLEINMAN: But is it your job to bring a lawsuit  
13 on their behalf?

14 MR. GOLD: Objection.

15 THE WITNESS: This is outside of my job.

16 MR. KLEINMAN: So because it's not your job, you  
17 didn't think that you needed to talk  
18 to them to get their opinion on  
19 whether or not they believe this to be  
20 racist or targeted towards the black  
21 community?

22 MR. GOLD: Objection.

23 THE WITNESS: Is it not my job to promote the ideas  
24 that are raised by this robocall.

25 MR. KLEINMAN: And you believe that investigating the

1 BY MR. KLEINMAN:

2 Q What are some other groups that could have, in  
3 your opinion, be affected by this robocall?

4 A People of lower socioeconomic standing, people of  
5 lower educational standing.

6 Q Is there a reason that the lawsuit wasn't brought  
7 on behalf of people of lower economic standing?

8 MR. GOLD: Objection. Ms. Hart, do not speculate  
9 or disclose any conversations you've  
10 had with your attorney.

11 MR. KLEINMAN: No conversations. You're a Plaintiff  
12 and you're bringing this on behalf  
13 of -- well, are you aware of the  
14 allegations of the lawsuit, Ms. Hart?

15 THE WITNESS: Yes.

16 BY MR. KLEINMAN:

17 Q What is your understanding of why you're bringing  
18 this lawsuit?

19 A Because the lawsuit -- or the robocall affects  
20 particularly black voters.

21 Q Did you not think it was important to also  
22 protect white voters of a lower socioeconomic  
23 class?

24 MR. GOLD: Objection.

25 THE WITNESS: Certainly.

1 MR. KLEINMAN: Certainly you did not think it was  
2 important?

3 THE WITNESS: It is.

4 BY MR. KLEINMAN:

5 Q Which particular statements in the robocall are  
6 you alleging was targeted toward the black  
7 community?

8 A All of the statements which contained the tropes,  
9 as I call them. Used to track down old warrants;  
10 pushing to use records to track people for  
11 mandatory vaccines; used by credit card companies  
12 to collect debts.

13 Q Okay. So each of the statements before that you  
14 allege are false you believe are also targeted  
15 towards the black community; is that fair to say?

16 A Yes. In addition, the closing statement, don't  
17 be finessed into giving your private information  
18 to the man, which comes from Blaxploitation films  
19 from the 1970's.

20 Q What films in particular use that phrase?

21 A I would say probably most of them in some form or  
22 another.

23 Q Ms. Hart, is it fair to say that in your mind the  
24 robocall could also affect white people?

25 A Sure.

1 Q Were you personally intimidated by the robocall?

2 A No.

3 Q How were you affected by the robocall personally?

4 A It's a waste of my time.

5 Q Aside from it wasting your time, how else were  
6 you affected by it?

7 A By waste of time I mean personally and  
8 professionally.

9 Q Okay. How did it waste your time personally?

10 A I was trying to work at home when I received this  
11 call on my home phone. That's how it's a waste  
12 of time.

13 Q Now you testified before it actually went to your  
14 answering machine though, correct?

15 A Yes.

16 Q Is there a reason you didn't walk out of the room  
17 or delete the call or otherwise hang up on it?

18 A It was broadcasting as I was busy doing something  
19 else.

20 Q And that broadcast wasted your time?

21 A Yes.

22 Q How was it a waste of your time on a professional  
23 level?

24 A With the community I work with and the manner in  
25 which we operate within the community, we spend a

1 robocall before it went out?

2 A I was not.

3 Q As a result of the robocall, did you sustain any  
4 financial losses?

5 A The original robocall?

6 Q Yes, I'm sorry, the August 26, 2020 robocall, did  
7 you sustain any financial losses?

8 A No.

9 Q Did you sustain any financial losses as a result  
10 of the corrective robocall?

11 A No.

12 Q As a result of the August 26th, 2020 robocall,  
13 did you sustain any psychological or emotional  
14 injuries?

15 A No.

16 Q Ms. Hart, how do you know that the August 26th  
17 2020 robocall wasn't a machine?

18 A I don't know that for a fact.

19 Q How do you determine the difference between a  
20 machine calling and a black person calling?

21 MR. GOLD: Objection.

22 THE WITNESS: I have experience with hearing.

23 MR. KLEINMAN: As we sit here today, you don't know;  
24 is that correct?

25 THE WITNESS: Don't know what?